

United States District Court
Northern District of Illinois

Diane M. Dillon Phillips,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 07C6461
)	Judge David Coar
)	Magistrate Judge Michael Mason
)	
Thresholds Psychiatric Rehabilitation Centers,))	
an Illinois not-for-profit corporation,)	
)	
Defendant.		

DEFENDANT'S RULE 26(a)(1) INITIAL DISCLOSURES

Pursuant to Fed. R. Civ. P. 26(a), Defendant, The Thresholds Psychiatric Rehabilitation Centers and referred to in this document as "Thresholds" or "Defendant"), hereby serves these Initial Disclosures to the Plaintiff:

(A) the name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information;

The following have information regarding the work history of the Plaintiff at Thresholds:

Pat Biggs,
Thresholds Employee and a supervisor of the Plaintiff
4101 N. Ravenswood
Chicago, IL 60613
773-572-5500

Marc Fagan
Thresholds Employee and a supervisor of the Plaintiff
4101 N. Ravenswood
Chicago, IL 60613
773-572-5500

KatherineHall
ThresholdsEmployee,
4101N.Ravenswood
Chicago,IL60613
773-572-5500

ShirleyMoorer
ThresholdsEmployee,
4101N.Ravenswood
Chicago,IL60613
773-572-5500

GarrettRaubolt
ThresholdsEmployee,
4101N.Ravenswood
Chicago,IL60613
773-572-5500

AprilBullock
ThresholdsEmployee,
4101N.Ravenswood
Chicago,IL60613
773-572-5500

CyrusD.Solhkhah
Lastknownaddress:
5733N.SheridanRd.
#30A
ChicagoIL60660
773-293-3150

(B) a copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment;

Threshold has in its possession the Personal file and other work related documents of the Plaintiff. Threshold has previously submitted to the Illinois Department of Human Rights a Position Statement involving the fact of this cause of action, a copy of which was served on the Plaintiff.

(C) a computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries

suffered;and

Thresholdshasnosuchcomputationsorothermateri alsregardingalleged damages.

(D) forinspectionandcopyingasunderRule34any insuranceagreementunder whichanypersoncarryingonaninsurancebusiness maybeliabletosatisfypartorall ofajudgmentwhichmaybeenteredintheactionor toindemnifyorreimbursefor paymentsmadetosatisfythejudgment.

ThePlaintiffhasanInsuranceAgreementwithPhil adelphiaIndemnityInsurance CompanyPolicyNumber:PHSD264107.Documentation relatingtothispolicyis availabletothePlaintiffforinspectionandcopyi nguponrequest.

Thesedisclosuresdonotconstitutewaiverofanyw orkproductprotectionandare withoutprejudicetoanyotherissueorargument.

Submittedby:

/s/BruceJefferson April28,2008
BruceJefferson Date

BruceJefferson
GeneralCounselforTheThresholds
4101NorthRavenswood
ChicagoIl60613
773-572-5210
AttorneyReg.No.6185531

Certification of Service

I certify that the attached Defendants Rule 26(A)(1) Initial Disclosures of The Thresholds was sent this day by 1st Class US Mail to the Plaintiff at the following address:

Diane M. Dillon Phillips
2138 West 114th Place,
Chicago, Illinois 60643.

/s/Bruce Jefferson
Bruce Jefferson,

April 28, 2008
Date